

NASA - JPL SSIC No. 9661 1 2 REMEDIAL PROJECT MANAGERS' MEETING 3 NASA/JET PROPULSION LABORATORY 5 7 September 2000 6 7 ATTENDEES: Charles L. Buril, JPL 9 Mark Cutler, Foster Wheeler Richard Gebert, DTSC 10 11 Vitthal Hosangadi, Foster Wheeler 12 Tim Howell, NASA Management Office 13 Mark Losi, Foster Wheeler Heike Mueller, TechLaw (via telephone) 14 15 Judith A. Novelly, JPL 16 Mark Ripperda, USA EPA 17 Peter Robles, Jr., NASA 18 Richard J. Zuromski, Jr., Navy/Nasa 19 20 21 22 23 24 Reported by: Louise K. Mizota, CSR 2818 25 1

1	Pasadena, California
2	September 7, 2000
3	9:45 A.M.
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5	ROBLES: Why don't we start going around the
6	room, with this extinguished gentleman here.
7	HOWELL: I'm Tim Howell. I'm NASA's counsel
8	here at the (INAUDIBLE).
9	ZUROMSKI: Richard Zuromski from the Navy in
10	Port Hueneme.
11	RIPPERDA: Mark Ripperda from EPA.
12	GEBERT: Richard Gebert from DTSC.
13	HOSANGADI: Vitthal Hosangadi at Foster Wheeler.
14	LOSI: Mark Losi, Foster Wheeler.
15	NOVELLY: Judy Novelly, JPL.
16	BURIL: Chuck Buril, JPL.
17	CUTLER: Mark Cutler, Foster Wheeler.
18	ROBLES: Peter Robles, NASA Management Office,
19	the Remedial Project Manager for this JPL site.
20	I want to start off with our agenda on the
21	groundwater pilot studies. So I want to turn that
22	over to Richard.
23	ZUROMSKI: See if we can get Alex on the line
24	one more time. He's really important to this.
25	ROBLES: He's the one that wanted this.

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        ZUROMSKI: Right. He's the one that wanted
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    this, so --
               (Discussion held outside the record.)
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 4
        RIPPERDA: So we'll just skip number 1 for a
    while?
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                Right. Why don't we go to agenda item
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        ROBLES:
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    2, the soil feasibility.
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              (Discussion held outside the record.)
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        RIPPERDA: Hello, Heike. It's Mark again.
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        MUELLER:
                  Hi.
        RIPPERDA: Alex Carlos from the State isn't
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    available right now, so we're going to skip his part
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    and come back to it later. So we're going to move
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    into the soil feasibility study.
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        MUELLER:
                  Okay.
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        ROBLES: All right. So what we want to do,
    first of all, is talk about it and then also talk
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    about the EPA comments to the soil vapor extraction
    design. So you want to go?
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        MUELLER: Would it be possible to go around the
    table and let me know who's there?
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        RIPPERDA: We did that, but just really quick,
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    that was Peter Robles from NASA.
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              Richard Zuromski from the Navy is probably
   going to be doing most of the talking. And then
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there's a few other random people. I'll give you a sign-up sheet afterwards.

MUELLER: Okay. That's fine.

ROBLES: What we wanted to do is, first of all, we got the comments on the SVE. And what we wanted to do is first look over generally what were your concerns on that. We have read your comments. We would like that the Foster Wheeler folks take those comments and address them in a letter format back to the EPA so that you can look at the response. We believe that we have addressed some of them.

So does anybody want to talk from the Foster Wheeler's side?

HOSANGADI: I figured we could go through them.

There are some questions that we have about the comments. And there are -- you know, we want to understand what some of your concerns are on some of the comments so that we can come up with a valid response to them.

ROBLES: So why don't you go through that.

RIPPERDA: I guess before we talk about that, that's just our general comments on the SVE. So is there -- shall we just get the FS out of the way first? Is there any questions about the FS? Are you guys going final with it?

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        BURIL:
                As far as the FS is concerned, I'm
    looking for the letter that discusses that right
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          I know I have a copy of it here.
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 4
              Changing it in the fashion that you
    identified doesn't really pose a problem for us as
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 6
    long as it's recognized that we don't have to
    address the SVE letter specifically in order to
 7
    allow it to go final.
 8
                   Yeah.
                          Not at all.
 9
        RIPPERDA:
        BURIL: As far as that's concerned, then,
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11
    changing the document as indicated doesn't really
12
    pose that much of a concern for us. And we should
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    be able to address those changes here in the next
    two, three weeks without too much difficulty.
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        ROBLES:
                 When do you expect the final document
1.5
    to come out?
16
17
        BURIL:
                Probably mid this month.
18
        ROBLES:
                 Okay.
19
                Somewhere in that range.
        BURIL:
20
        GEBERT:
                 So I can tell my boss that the OU-2 FS
    is approved and final. Right? That's a fair
21
    statement?
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        ROBLES: That's a tentative right.
        GEBERT:
                That's a correct statement?
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25
        ROBLES:
                 That's a fair statement, minus the SVE
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design, which we are addressing as a separate issue
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    within that.
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        RIPPERDA: Right. The SVE design was not truly
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 4
    part of the FS. The FS talks about SVE because it
 5
    has to.
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        ROBLES:
                Right.
 7
        RIPPERDA:
                   But it's not a necessary component of
    the FS.
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        ROBLES:
                 So in the sense, yes, Richard, you
    could say that the FS is complete when we send it
10
11
    out.
12
                 You'll probably receive replacement
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    pages, replacement cover sheets that say "Final" on
    it and the replacement pages to address Mark's
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    letter. It will probably come in a package and a
15
    three-ring binder, Mark will probably put together,
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17
    replace these pages with these pages so it will be
    very clear and then it will be a final.
18
                 The RI.
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        GEBERT:
                 As Chuck says, in a few weeks.
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21
        BURIL: Yes.
        RIPPERDA: On the FS, it kind of spills over
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    into the SVE design, but the FS had Appendix C about
    shutoff criteria. And I don't actually have a copy
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of the Regional Board's shutoff criteria. I don't

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1 | know if Appendix C was just a --

HOSANGADI: It was based on those.

RIPPERDA: -- was pretty much just a summary of that and the whole asymptotic design concept is based on Regional Board's requirements.

LOSI: And the modeling requirements as well.

HOSANGADI: Basically, we took the Board's guidance on how they deal with soil extraction sites where there are VOCs and they have this methodology of estimating levels of VOCs in soils that you can leave behind that are still considered predictive of groundwater.

Now, of course, at this site and at many other Water Board sites they have required that soil data not be considered, which in fact is true here as well, and they provide an equation for connoting the soil concentration that you find that is predictive of the groundwater. Let's say, for example, it's 5 micrograms per kilogram. They give you an equation to connote that microgram per kilogram into a soil vapor concentration, which you can then compare with soil vapor concentration from probes.

Granted, it's not the best way of doing it, but if you don't have soil concentrations, that

is a reasonable way of approaching it. Of course, they do have a caveat that, you know, that's not the end all. We would have wanted to collect soil samples and analyze for VOCs which is kind of counterproductive because we've started off saying that we're not going to do that and -- but, you know, we tried to work within the confines of that while still trying to be, you know, technically sound.

RIPPERDA: Okay. Some of that didn't quite come across in Appendix C. The Appendix C spent so much time on the rebound --

HOSANGADI: That is true. It so happens that this is a critical aspect. I mean the way they actually laid it out is pretty straightforward.

They said first of all, you design it so that you're getting absolute coverage and you operate it and you make sure that as you operate it you are essentially evaluating your design.

Say, for example, we said we need four extraction wells for the site. You make sure that as we are pulling from those four extraction wells we are, indeed, seeing a good flow from the site, you know, in monitoring points all the way from the wells. We also keep track of the VOCs that are

coming out. We will also keep track of the Vocs in individual monitoring points. So, for example, if you were to get a lot of VOC removal but you have monitoring points that are 1,000 PPM, does that mean that SVE is effective, even though it might have pulled out a million pounds? Not necessarily.

concurrently. And when all of those have happened, when we have validated the design, when we see that we have removed as much as we can remove of the SVE wells, we've seen that the concentrations in the monitoring points are, indeed -- have also decreased. Then they recommended to go into the cycle of shutdown and rebound where you would shut the system off, you know, for almost up to a year and take samples before you shut down and then on a quarterly basis after the shutdown and see how much rebound there is.

Now, as far as the rebound goes, though, it's not straightforward. The rebound is not a function of the number itself, but it's tied into that soil gas cleanup goal that I mentioned earlier, which makes it a little bit difficult at some sites. So say, for example, we reach 100 micrograms per liter and you're not able to go any lower than that.

The amount of rebound they allow you is not a 1 function of that hundred. On the other hand, say if 3 our cleanup level was 5 micrograms per liter, they 4 allow you 50 percent of that number as your rebound. So they will say in that case, yes, you reached 100 microgram per liter, you can only go up to 102.5. 6 7 If you go to 102.6, that is considered to be -- you know, the rebound is not acceptable. So that's the 8 way the Water Board got it set up. 10 Now, you know, one can question the logic 11 of that because, you know, in that case the amount of rebound is not tied into the initial number. 12 13 we still assume that that would work when we took that into account. 14 RIPPERDA: Actually, your explanation sounds 15 16 It sounds much better than what I got from 17 reading Appendix C. 18 ROBLES: Do you want that to be explained better? 19 Actually, my comment here, like I 20 21 don't know which ones of these are going to be blown off and which aren't. But I would like to see --22 23 HOWELL: We give more deference than that. I would like to see Appendix C 24 removed from the FS. 25

BURIL: That's not an issue. That's fine.

RIPPERDA: And then all of that dealt with in

more detail like you're talking now.

BURIL: In the design criteria.

RIPPERDA: In the design criteria.

HOSANGADI: Right. Because actually, you know, the thing from Castle Air Force Base that you sent, that is essentially an expansion of that same concept because where the Water Board doesn't take financial considerations into account. The stop method does -- I've been at a couple of sites where we do, indeed, look at how much impact the soil would have on the groundwater in the future, either by V-leach or I've used AT 123D at another site. But it also looks at if you were to continue running the SVE system, how many more pounds of VOCs are we going to pull out, what the cost of the extra removal is going to be versus letting it remain in the soil.

Now, unfortunately, it has to be tied into a groundwater remedy. For example, if you have 10 pounds of VOCs left in the soil and you've pulled out 2,000, and you have a system in place to address the groundwater, which is what I have at one of my sites, is the extra effort in terms of getting those

last 10 pounds out worth it as opposed to just either letting it remain in there and degrade and, you know, eventually go to groundwater when you have a remedy downgradient in place already.

so the stop method basically takes economics into account, you know, whereas the Water Board method doesn't take that into account. If you have it, you have to do it. It doesn't take into account the fact that well what if the VOCs are, you know, a minuscule possibility of water there to start with and what if they are right at the water level interface. Your SVE system is probably not going to be able to get it, but it would go into the water and if you did, you would have an extraction system downgradient so it -- the stop method basically is more forgiving and more realistic in that sense.

So, you know, by taking the Water Board approach, it's not that they're taking a less stringent approach. In fact, it's a more stringent approach because they're not taking into account the fact that there is or there may be downgradient extration wells, or in fact in this case, you know, of course they are a bit more downgradient than you would want, but, indeed, it is being addressed.

RIPPERDA: Yes. No. I don't have any problem with the Water Board method. And I do think at a system like this where you do have integrated groundwater and SVE system --

HOSANGADI: Right.

RIPPERDA: -- that you can certainly make a case for doing exactly what you're saying.

HOSANGADI: Exactly. Now, while on that topic, there's one important part of the Water Board methodology that can always trip up, and I've seen it trip up a couple of sites, is right at the -- in the soil right above the water table you might have VOCs.

Now, if you were to have an SVE system, your efficiency right near the water table is probably going to be minimal unless you've actually got wells that are screened right and the water level has gone down a little bit. In their view, what happens is you might have some VOCs in the groundwater, which may offgas and you might always have some higher level of VOCs right at the water table.

With the Water Board's method, basically, and logically so, the lower the point is, the more stringent the cleanup level. In other words, if the

point where the point of compliance, if you will, is, say, five feet above the water table, the cleanup level might be 5 microgram per liter. If it is 100 feet above, the cleanup level might be 50 because of the distance. So it's always at odds in that bottom portion.

method, if you do, indeed, find that we are having a rebound more than 50 percent of the cleanup level, which is already very low -- it's actually at 5 microgram per liter most -- in fact, even less than 1 microgram per liter for some compounds. And if you have a concentration of 3 and you can only go up by .2 microgram per liter, I mean, how easy or difficult is that? A very small variation will cause it to go up a point. So it's always a questionable in that bottom layer whereas the stop method would take this into account because there is a means of, you know circumventing that particular aspect, if you will.

So that was, you know, the intent of the Appendix C because -- and what we did, also, elaborate a little more, in there was not really -- you look at all of these, you kind of make sure up front that what you designed is appropriate for the

site. You know, for example, you cannot apply any 1 of those criteria independently. You have to have 2 reduction in VOCs that are coming out and you have 3 to show that you are, indeed, impacting your entire 4 And those two lines of evidence, you know, 5 6 concurrently show that you've done what you can. Because if you haven't got enough clear -- haven't 7 got enough knowledge, you might get fantastic removal, but you might have 1,000 pounds left in 9 10 there. RIPPERDA: Right. 11 HOSANGADI: That's why it's, you know, it's 12

HOSANGADI: That's why it's, you know, it's parallel the lines of reasoning. They don't converge except at the end point.

ROBLES: So let me get this straight. That

Appendix C for OU FS will be removed. We will

augment the discussion as you have stated so that we

can make sure that Mark's --

BURIL: I don't think we need to augment the discussion. I think all we need to do is make the point that the design criteria, when they're developed, will need to include shutoff criteria.

ROBLES: Okay.

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BURIL: That will defer it to a design problem as opposed to an FS problem, which I think is

probably more appropriate anyway.

ROBLES: Which is what you're looking for.

RIPPERDA: Right. I want a nice clear statement in the FS that the shutoff criteria were based on Regional Water Board requirements and protection of groundwater.

BURIL: That's all the more that we need to address that one. And then just simply remove Appendix C and any references that we make to it.

HOSANGADI: Right. Exactly. Exactly.

BURIL: And we have addressed that comment.

It's not critical to the FS completion to that, that be in there. It is critical to design and operation parameters, but certainly not to an FS.

HOSANGADI: I should also point out that it turns out that a number of the soil gas levels, if you were to, indeed, calculate the cleanup levels, a number of them are already below those levels, because we are talking in the single-digit microgram per liter. Particularly for somewhere around 50 feet above the water level most of those points at this point in time are probably below their requisite cleanup levels.

CUTLER: That pilot test, in reality, has been wildly successful, if you look at real data.

1 RIPPERDA: Yeah.

ROBLES: That's what we're looking for here.

Okay. Shall we move on to the comments for the SVE design?

BURIL: Mark, are you satisfied with --

RIPPERDA: Yeah. No. That sounds great.

ROBLES: Could you, Mark, put down the phone number of the person that's on there and her name so that way we can keep it.

Why don't you go --

HOSANGADI: Let's just go through them one by one. Comment number one relates to -- it partly relates back to the RI in the sense that, you know, it's being suggested that the soil vapor probes that were put in to get the -- you know, get an idea of where the VOCs were, were not necessarily placed in the right spot. And on looking at the RI they were, indeed, placed in the right spot.

Now, one distinction to make, though, is we wouldn't want to put a soil vapor extraction well where a spill might have occurred. We would obviously put a soil vapor extraction well or wells where the VOCs are. So the fact that there were some drums that were disposed to land for a number of years and the fact that there were some tubs that

were used to soak parts really has no bearing on where you put the extraction well, because what if the soil vapor probes right below that spot came up nondetect? You wouldn't want to put a vapor extraction well there.

On the other hand, if you were to see some areas of the site that were distinctly higher than the rest of the site, that's where you would want to put the vapor extraction well. And as it turns out, that's exactly what we did. We looked at the areas where there were spills. We compared, you know, compared that knowledge to the VOC levels in the probes and we didn't find much there. We found other places where, indeed, the concentrations were two to three orders of magnitude higher. And so we placed our well right there.

Now, the fact that it is 450 feet away from where the disposal might have occurred has really no bearing on it because -- just because 450 feet away had disposal doesn't mean that we have VOCs there. So that essentially is our response to the first one.

Now, as far as the single line of evidence, that is something that we are almost forced to do, because for this site, as for many

other sites in this area, the Water Board has specifically said that you will not depend on soil VOC data. And the reason for that, I should explain. Normally when you have soils that don't have very much organic matter in them, as is the case for most of the soils in California, at least, you know, most of the sites that I have dealt with that has been the case.

You very often end up in a situation where you go and do a soil boring and you collect samples. You send it off to the lab. The VOCs come back close to nondetect. You take a sample of the groundwater below the site and it has tens or hundreds of micrograms per liter. How do we, then, explain the fact the water is contaminated and the soil is not? Does that mean that all of the contamination in the soil has reached the groundwater? Absolutely not. If you were to, from those same wells, collect a soil vapor sample, you will almost always find evidence of VOCs in there. And as a result, that's actually the main reason why the Water Board started moving -- I think DTSC is also pushing towards moving away from soil samples.

Now, of course, EPA has (UNINTELLIGIBLE) recommends that there is a problem with collecting

soil samples in the way that people have been looking and collecting them and they have come up with Method 5035, which to some extent, you know, takes into account all of the, you know, the problems with the conventional way where, you know, we would collect a sample and most of it probably would volatilze right there. We did not obviously have the benefit of that method 10 or 12 years ago when some of these things were done. So to a great extent we are forced to that single line of evidence and we are trying to use it to the best extent possible.

cutler: Right. Just a little caveat. In the early days we proposed soil samples. We were told by the agencies not to do it. So I guess the issue on why soils samples were not collected probably should be addressed to the Water Board. It's hard for us to --

HOSANGADI: Right. Right.

CUTLER: -- answer for them. We will do the best we can, but it was their call.

RIPPERDA: Right.

BURIL: Well, let's go back just a little bit more in history on that as well, because given the geology that we have here, all of the fellows that

have been working on the site for a while know that the drilling conditions here are a nightmare when it come to trying to get soil samples or even just to advance a well.

So we've typically used -- up until the time that sonic drilling became available to us, we typically used an air percussion rig or something like that to hammer through rock. Well, the introduction of air was a method that the Regional Board, and I believe DTSC also, both just said "No. We cannot allow that. We cannot allow a soil sample that has been subjected to high-pressure air in the construction of this well to be used for vapor or organic analyses that may be volatilized through the introduction of that air."

So we need soil vapor wells. And in fact, that was the basis for going to soil vapor wells in concept in this entire investigation as opposed to going to the individual sites and doing individual soil sampling. That's why we ended up with 28 soil vapor wells as opposed to the original ones that we had in the draft workplan.

CUTLER: We actually in the early days argued against it.

BURIL: We did.

CUTLER: Because for the very reasons how do you quibble (UNINTELLIGIBLE) rate soil vapor with cleanup levels.

HOSANGADI: Right.

BURIL: That is exactly right. Yes.

CUTLER: We're trying to look past the FS stage.

Now what do you do? So there again, it was an

agency decision.

BURIL: This even predates Peter to a certain degree. So this was a conversation that happened back in the early '90s and we've been following through with that kind of logic and approach all the way through.

personally I like deep soil vapor wells. I do think for deep wells they give more than soils samples themselves a lot of times. But I didn't look at the RI data again at this point. So when you're comparing your soil vapor data near the source, potential source areas, did you have good location of your soil vapor wells? Did they go deep enough? Since groundwater is highly contaminated right near some of these source areas, do you actually have good coverage with your --

HOSANGADI: Yeah, I believe we do.

RIPPERDA: -- test wells?

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HOSANGADI: Yeah. And in fact, it was based on that that we, you know, not looking necessarily around there, but looking all over the place, we found that, indeed, there were much higher levels of VOCs at a, you know, good distance from there. And that's not very -- it happens, you know, it happens all the time. But there was enough time for these things to happen.

And in fact, you know, during the course of the test, we did, indeed, and I think we tried to explain it as best as we could in Appendix A. actually found, at least in the very early portions of the test, we found what we think were slug or slugs of TCE. And basically what we were doing was, you know, we were basically collecting samples of the influent every few hours. I think at the beginning just two or three samples a day. And it always had carbon tetrachloride and Freon and no trichlorethylene whatsoever. Only once or twice it showed up at maybe 5 or 10 PPB and so the lab reported it. And the carbon, of course, had been designed based on what we thought might come out. And of course, once we knew what was coming out in the first few days, we figured, okay, based on this

and based on isotherms that the vendors provided, we should see breakthrough in about two or three months and we should be fine. Of course, we did have extra vessels there just to make sure in case we did have breakthrough from the first vessel that wouldn't emanate into the atmosphere.

Sure enough, within three weeks, we saw breakthrough on the first vessel and that was kind of surprising, because maybe -- maybe there was more than what we thought. So we changed the carbon out, and in the process of the disposal the vendor actually analyzed the carbon and the carbon vendor said, "Do you realize that you have almost 40 percent trichlorethene in your carbon?"

I said, "No, that's odd, because we didn't have that in the vapors."

So anyway, we changed the carbon and continued the test. It broke through again in about four weeks this time. Again, there was very little TCE in the extracted vapor. But when we analyzed the carbon again, mostly I think it was TCE. That kind of pointed to the fact that there must have been a slug of TCE that came in, and because of our sampling, obviously we wouldn't want to collect samples every hour because that would just make for

a tremendous amount of lab money. We used -- just collected what was reasonable, maybe, you know three or four hours and then later on we actually moved it, you know, once every two or three days. So it's very likely that a slug of TCE came in right, you know, right when we were not sampling.

Now, of course, where that slug was, we have no way of knowing. But, you know, to some extent it validated the fact that not only do we have our well right there, but, you know, even -- and if there are any slugs nearby it is, indeed, coming in, basically.

so, you know, again, you have one line of evidence. But you cannot always have two lines of evidence while doing a pilot test, because if you wanted a second line of evidence, then every six months you would have to go and poke a hole and collect samples, you know, 50- or \$60,000 a hole you'll have -- you know, you will have basically spent all the money in having the second line of evidence when you can make do with the first line of evidence. It's not incorrect. It's just one line of evidence, and that's fine.

BURIL: I think the key here to recognize is

that the proof is, as the old saying goes, the proof is the pudding. We are getting high amounts of VOC out of the ground using this approach. And I think that's the critical factor that everyone needs to consider, is while we like to discuss whether or not we need second lines of evidence or whether the VOC characterization is complete or whatever questions you might want to bring to bear on the issue, the fact is that the system works. The entire idea appears to be quite, quite practical for the application here at JPL. And as such, I think it's a question of just an optimization —

HOSANGADI: Right.

BURIL: -- of what it is that we already know, and on the basis of that move forward.

that, okay, maybe the vacuums that we were seeing 5and 600 feet away are not believable, maybe even the
ones that are 400 feet away are not believable. If
you do not believe those vacuums, that's fine. We
are, in fact, recommending that we don't even look
at radius of vacuum influence as a means of figuring
out how to space your wells.

What we were saying, and this was one of the main reasons why we did the long-term test, was

let's see how much the VOCs reduce the soil gas as a result of your testing. Because after all, we can say that radius of influence is 10,000 feet. But if you are not seeing any reduction in VOCs there, what's the point of doing SVE? The point of doing SVE is not to show your air flow there. It is to remediate at a distance away from the well. And we saw routinely, you know, 400, 500 feet away we were seeing 90 to even 95 percent reduction in VOCs. And that to us is proof that, indeed, we are seeing an effect.

Now, granted, if you were to leave that system off and measure the rebound, you might have some rebound. But that's not the issue. All we are saying is we have already seen the change 400 feet away. The fact that you are rebounding only means that we have not pulled long enough. And again, the fact that, you know, you see a radius of remediation influence of 400 feet by no means are we saying that, "Well, let's place the wells 800 feet apart." I mean, as a design engineer if someone were to tell me, "Well, your radius of remediation influence is 400 feet and here are all the caveats and this is how the site was," I as an engineer would say, "Well, to be on the safe side, I might place my

wells at, you know, maybe 500 feet apart." So that's equivalent to an effective radius of remediation influence around 300 feet or so.

so looking at all the comments, we got the sense that, you know, there was, you know, almost disbelief at the high numbers. And as we get into those specific comments I can --

BURIL: There was absolute skepticism on my part.

HOSANGADI: Right. As we go into the other comments, I'll explain to you why some of that disbelief may be unfounded, actually.

MUELLER: I think the intent of this and other comments is basically to say that if you want to place more, or if you are going to place more extraction wells, you should look near known source areas. That was one point --

HOSANGADI: I would --

MUELLER: -- which you already mentioned.

And the second point that this comment was pointing out was select well spacing sufficiently close, actually, to capture all of the VOCs so that the VOCs don't have a long travel time to the actual extraction well.

And, thirdly, the shuttle's criteria

should not only be based on the fact that there is an asymptotic level in one well because it could mean that this well is just not properly located in the center of VOC contamination.

HOSANGADI: Okay.

Mueller: Those three points that were sort of summarized in the very first comment.

HOSANGADI: Right. Now, as far as that goes, your first point was we should locate the wells near the source areas.

And like I mentioned earlier, if you don't have VOCs in the source areas, I don't see any point in locating a well there just because 25 years ago there was some disposal at that location. You would obviously want to place your wells where there are VOCs. So that's -- also keep in mind that this was just --

MUELLER: (UNINTELLIGIBLE) water contamination in that area also, so maybe your wells that you had looked at before were not light right there where the most -- the main plume of the VOC gas was located. Because you have water contamination in the same area.

HOSANGADI: Right. But, you know, the SVE well is basically placed to take care of VOCs in the soil

vapor, not in the groundwater. And we actually placed the well right in the center of where the highest soil vapor VOCs were. And this is just one well. We're not -- I'm not implying by any means that all the future wells are going to be right there. Obviously the future wells will have to be place with respect to where the contamination is. And, of course, it will have to be placed in a fashion that we are, indeed, able to capture all of the VOCs. So, you know, I'm not denying the fact that we would have to have the wells there to capture the VOCs. I'm just wondering if it makes sense to put the well where we think the source might be when actual RI data indicate that the source might be elsewhere or not necessarily the soils, but the high VOC concentration might be elsewhere.

MUELLER: Right.

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RIPPERDA: This is not worth arguing about.

BURIL: I don't think it is either.

RIPPERDA: But the basic point is, you know the data much better than we do. So when you do your design, just do a really careful job of presenting all the data from all the RI work.

HOSANGADI: Right. Absolutely.

RIPPERDA: And to make it clear why you picked where your wells went, you know, justify that, and justify where you're putting your new wells. And if we look at that and say "We don't agree with your data," or "May this well -- " we just don't believe the results from this well so we think maybe that well was poorly installed or it's sucking from too shallow or something like that, we might then ask for an additional boring or an additional extraction well, you know, two or three, from what you propose. That's the whole point.

HOSANGADI: Right. And, in fact, even when putting the future wells, it may, indeed, be better to actually do it in a phased approach, where we figure out this is the first part where we need to get a well, put the well in there, run it for a while, make sure that you are seeing the same levels that we saw in well number 1, look at all the soil vapor probes again, and then, you know, keep moving out until we cover everything. You don't know.

Maybe a second well may be all we need because the concentrations may be, indeed, low. Because that should not be ignored either. The concentrations are, indeed, borderline at the moment at a lot of locations.

BURIL: Why don't we move on to comment 2, then, with regard to the SVE comments. I think we've made our point on item 1.

Here the question comes up as far as the verification of the conceptual model and the appropriateness of the SVE system and the evidence that the shutdown criteria be protective of the environment.

I don't know that there was ever really an intent in Appendix C to try to verify the appropriateness of the design, the appropriateness of the site conceptual model or to do anything other than discuss in general terms the shutdown criteria. But if we're going to be removing Appendix C, I think this comment all but goes away.

RIPPERDA: Right. Your FS -- you know, it happens a lot where you kind of go halfway towards a goal, but not all the way.

BURIL: Right.

RIPPERDA: So you don't do a good job of completing your goal, but you've raised enough questions by trying. So by removing it from the FS, that's good. And in your design document, we just -- one of the problems with Appendix C was that it didn't focus on a lot of the stuff that you have

actually been talking about of looking at impacts to 1 2 groundwater. HOSANGADI: It's implied, though, because the 3 Water Board basically has come up with this criteria protective of the groundwater and by following that 5 criteria, we are therefore then being protective. So I didn't try to reinvent the wheel as far as --7 RIPPERDA: Right. Okay. 8 HOSANGADI: -- protection of groundwater. 9 BURIL: Regardless of that, I think by removing 10 Appendix C we've removed the issues identified --11 RIPPERDA: Right. 12 BURIL: -- here and we needn't spend any more 13 time on it. 14 Okay. Number 3, then. 15 HOSANGADI: Number 3, actually --16 I think we found a typo that covers 17 BURIL: this. 18 HOSANGADI: Right. It should have actually said 19 "three weeks." The calculations in Appendix C were 20 actually correct. We came up with somewhere around 21 22 to 25 days. And the "porosity" should actually 22 be the "effective porosity." So we'll basically 23 make that change on that page. 24

The last paragraph in that column, though,

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the issue of the surface air leakage rate is one thing that I want to find out why there was a concern, because basically, you know, at almost any given SVE site the air that comes into your well is almost always from the atmosphere. So, you know, the issue of surface and leakage rate, to me, is not a parameter that you would change your design based on. Because the effect of air surface or surface air leakage rate is taken inherently into account when we analyze the data. That was one question.

The other -- the question I was wondering about was it says that the surface air leakage rate through the 125,000 square feet of surface air and the 400 foot radius around the SVE well, and I was wondering what that 125,000 square feet was, because the area of a 400 foot radius circle we found it in 2,400 square feet.

RIPPERDA: If that was a math error, we apologize.

HOSANGADI: I was wondering if there was something else. But nonetheless, the question of the surface air leakage remains, because, you know, I have not seen, and I've been in numerous sites where SVE was used, I've not really seen where surface air leakage is a primary design parameter,

something that is taken into account. I mean the fact that you see responses X feet away, you are taking that into account because the air flow rate always is from the atmosphere going towards the well.

BURIL: Could I ask a question of Heike for just a moment?

Heike, are you concerned with air leakage as a function of leakage in the immediate area of the well which may be short circuiting its ability to have an effective radius of influence?

MUELLER: It had to do with short circuiting, yes.

HOSANGADI: Okay.

MUELLER: (UNINTELLIGIBLE) the estimated. And it may or may not be an important design parameter, but it does help you with the design in some ways because you can estimate whether it is going to be a problem or whether it's not going to be a problem.

HOSANGADI: Not true. Because, you know, so what if you know your surface air leakage rate from a 400 foot radius. How are you going to find out whether the air that entered your well was, indeed, from there or not unless you do some pretty extensive, you know, tracer test studies, which you

can spend a lot of money doing that, but the data is still not necessarily, you know, supportable because you would have to use multiple tracers, you would have to use multiple trace of injection points.

And, you know, you would have to have a monitoring program that you monitor it every minute, basically. If you miss one tracer, it might completely knock your data out.

You know, so that's why I don't know if
the -- you know, the surface air leakage, because if
you can be sure of what the actual rate is, then,
yes, you could use it in the design. But if you
cannot be sure of the leakage rate to begin with,
what's the point in considering it for a design?

MUELLER: You have in your pilot test -- you have a figure in here that shows that I think -- from extraction from screen A you have a very linear relationship which in some ways (UNINTELLIGIBLE) would point towards to some sort of short-circuiting. Maybe it's from the surface. Maybe it's not. And that was pointed -- this comment was in relation to that finding from the pilot test.

HOSANGADI: Yeah. And when we get to that comment, I can respond to that as well.

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But, you know, that response is not necessarily linear. Actually, if you look pretty closely, it does follow a slight curve. And, you know, the other fact also remains is that to some extent we were limited by the size of the blower, which as you will notice, that the Y coordinate for all of those three curves is almost the same. The fact it is linear, you know, yes, there may be some surfeiting, but remember, that screen is pretty shallow compared to the other wells. The fact that when we were pulling from screens B and C, we did not -- we see almost -- we saw almost no response in wells of a screen, you know, around extraction well A would indicate to me that there was not that much short circuiting to begin with.

And also, you know, to some extent it's related to your comment about the fact that flow to any well is always within the tens of feet away from the well. Again, that's not true. It may be true at a site where the water table is 50 or 60 feet. Yes, you might have flow from just, you know, 10, 20, 30 feet away. But remember, here you are talking about a site that is, you know, groundwater table is 200 feet deep. Plus we took the precaution of having three separate screens. That way we

can -- you know, if you were to have just a single screen, yes, there would be the fear. Because the vacuum at the top of the screen as you go down might be 15 inches of water. The vacuum at the bottom might be zero because all your vacuum has dissipated in the first 20 feet of screen.

But the fact that we have three screens with some, you know, reasonable seal in between them, we were to some extent ensuring that for the second well at the top we again have 50 inches of water. And then for the third well again at the beginning of the screen we again have 50 inches of water. So our flow lines are going to be, you know, drastically different as compared to just having a single well, basically.

MUELLER: If you're not as concerned about what's in the vadose zone around screen A, if you do have to address what (UNINTELLIGIBLE) in terms of VOC in that screen you still would have to have some impact on them. You have to have some way of addressing and pulling air from screen A eventually, because --

much VOC contamination around screen A. Also, keep in mind that, you know, the screens, you know, the

zones that we mentioned, 1, 2, 3 and 4 and screens A, B and C are not based whatsoever on geology. We literally looked at how much VOCs were there and we found that they were mostly in, you know, in the -- there was not that much VOC in the first 80 feet. So we, for safety, assumed that we would take care of 150 feet and we split that up almost equally into three separate screens, basically. So, you know, extraction from zone A -- from screen A may or may not be necessary for the full-scale remediation.

And also, like I mentioned earlier, your cleanup goals at height above water table are far less stringent. I mean, if you have a cleanup level of 5 microgram per liter at the water table your cleanup level around screen A might be 100. If you started off with 50, what's the point in -- (UNINTELLIGIBLE) that's something that relates to -- we'll have to relate back to where the VOCs are. When the next set of wells are put in we have to see where the VOCs are, basically.

BURIL: Could I make a suggestion here. Rather than going through each one of the comments, because I think that there is obviously some technical differences in approach here. Rather than doing that, perhaps we ought to focus on the questions

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that you have, Vitthal, to be able to have those resolved and hopefully we can get that resolved a little more quickly. And then in whatever response that we put forward we can put together a technical explanation as to why certain of these things that are being brought up may or may not be a real 6 concern for the site. 7 MUELLER: I think that's a good idea. 8 HOSANGADI: So should I ask the questions, then? 9 What questions you have BURIL: Yes. 10 specifically on the comments that you don't 11 understand. 12 ROBLES: So you can express the concerns, to 13 EPA. 14 Going to comment number 14, HOSANGADI: 15 basically. The very first one is what is IC 41? 16 that just something related for some other comment, 17 the very first sentence in comment number 14. 18 says the ROI for (UNINTELLIGIBLE) is estimated to be 19 three times three based upon soil vapor extraction 20 conducted at IC 41. 21 I don't know. Either that was a typo RIPPERDA: 22 by me when I was taking Heike's comments or Heike 23 got it from somewhere. So I don't know. 24

Do you know what that is, Heike?

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        MUELLER:
                  It's from the pilot test, I'm sure.
    I'm not familiar with all of the names.
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        BURIL: We didn't have nomenclature that went
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    that far, did we? It went to 38, I thought.
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 5
        MUELLER:
                  SC 41.
        ROBLES:
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                 Could you research it and get back with
    us?
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        MUELLER:
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                  I can check on the original.
    check on my original (UNINTELLIGIBLE).
                 Right. Could you check on it?
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        ROBLES:
                Heike, if you would just give me a call
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    and let me know. Or just drop me an e-mail would be
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13
    even better, letting us know the origin of that
    particular nomenclature and where you got it from.
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    That would be the ideal.
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        MUELLER: Okay.
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        HOSANGADI: Moving along in that same paragraph,
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    the statement about EPA statistics on 12 systems
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    back in '90, '91, what were the depths to
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    groundwater on those? Because, you know, it's not
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    just soil type that comes into play. Like I
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   mentioned earlier, if you have only 10 feet of
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   vadose zone, your radius of influence might be 30
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   feet, whereas if you had 200 feet you might have
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    200, 300 or 400 feet.
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So are we sure that those -- you know, the 1 2 data that they got from those 12 sites even 3 applicable at JPL? Because if it's not, then there's no point in saying that, you know, 12 sites 4 were studied in '91 and they all showed 100 feet. 5 The conditions may have been different. 7 BURIL: I think the key here is that we'd just like to have more information regarding the sites that were evaluated in this particular 1991 study 9 10 that you reference. If it's very similar geology and lithology as JPL, fine, that's something we 11 should take into account. If it's something 12 radically different in terms of the thickness of the 13 vadose zone or thickness of various types of 14 geologic units, then it may not have a lot of 15 applicability. We just need to be able to make that 16 17 comparison. MUELLER: Yeah, I have a list of references 18 too. 19 20 HOSANGADI: That would also help, because there 21 are a few references in there. 22 Exact reference (UNINTELLIGIBLE). 23 RIPPERDA: And on a specific question like this, 24 rather than just giving them the reference title, if 25 you could fax them the relevant pages from that.

1 BURIL: That would be ideal. 2 RIPPERDA: That would be the best. BURIL: Let me give you my fax number right now, 3 4 Heike, so you have it. It's area code 818. MUELLER: 5 818. BURIL: 354. 7 MUELLER: 354. BURIL: 3558. And if they're too numerous, by all means just send it to us. That works as well. 10 MUELLER: Who was that just now talking? BURIL: This is Chuck Buril of JPL. 11 (UNINTELLIGIBLE) radius of influence 12 MUELLER: 13 is always based on the screened intervals, all the extraction wells. So I'll look that up. 14 15 HOSANGADI: Yeah. That would help. 16 The second paragraph, you know, about the low vacuums and so on, the comment is, indeed, 17 And in fact, not only do barometric 18 19 pressures affect the vacuum readings, it's also the natural movement of air in the subsurface. So just 20 21 to take barometric pressure into account would by no means make sure that the data is absolutely 22 23 foolproof. And taking into account both the barometric changes and the subsurface changes is 24

somewhat difficult.

What we did instead was, because we had the luxury of running the test for a longer time, we closely observed the rise and fall in vacuum responses in monitoring points that go, you know, away from the well. And we distinctly noticed, and you can see in long-term, you know, testing and also in portions of test 2 that wells that were, you know, 500, 600 feet away, while the magnitude of responses may have been small, within a few hours of starting the vapor extraction blower we saw that the vacuums increased to a level of, say, maybe half an inch or an inch of water.

We kept the system running for a while. The vacuums were right around that level. We shut the system off and, sure enough, within less than 24 hours, the vacuums dropped back to zero. Now, that, to me, implies that, you know, that we are, indeed, seeing an effect of vacuum extraction at that distance. Granted that distance may be a lot, but nonetheless, you know, we cannot discount the response based on the distance.

And also, when you look at it in terms of depth to water table away from the extraction well, 400 feet is just two depths to water table away. So it's not really -- you know, in the big picture,

it's not really that far away, basically. And furthermore, as you notice, we moved away from ROVI as any indication of where we are seeing remediation because we actually went and looked to see where the VOCs are reducing. So the effort involved in trying to come up with a perfect estimate of ROVI is not really worth it because you're not going to use that number anyways. Rather, we are choosing to go with what would be a more appropriate number, which is the distance at which we are seeing a significant reduction in VOC levels.

BURIL: Your question was?

HOSANGADI: What are your concerns as far as the low levels of responses in light of what I just said?

MUELLER: The fact that we had seen some responses in wells that were further away that are higher than in wells that were closer to the extraction well, that was just something that sticks out and makes the whole evaluation more questionable.

HOSANGADI: Not necessarily. Almost at any site we are bound to see some aberration in terms of responses. And just the fact that a single response was higher than it should have been by no means

indicates that the rest of the data is incorrect. 1 2 CUTLER: It's certainly not homogeneous out 3 there. I think that's going to be part of what 4 BURIL: we address in our response. 5 6 MUELLER: Right. 7 BURIL: Any other questions per se for 8 clarification, Vitthal? 9 HOSANGADI: Yes. As far as the item number 15, 10 I'm just reading it from what was in there. "Reportedly, many hundreds, if not thousands of air 11 12 pore volumes are necessary to remediate a typical VOC spill." 13 Now, you know, the number of pore volumes 14 15 is a hotly contested topic, and I've heard people say 100. I've heard people say 10,000. These VOC 16 17 spills that were reported in the paper, were they 18 actually chlorinated VOCs, or were they gasoline? 19 Because for a gasoline site, yes, you may need thousands of pore volumes because in the first few 20 21 hundred pore volumes you might get all the benzene out and you leave maybe a few more hundred pore 22 volumes you get the toluene and xylenes out and you 23 might need a few thousand later on. 24

unfortunately, that led back to the fact that, say,

for example, if you need three weeks to take out one pore volume, we have probably taken out maybe 30 or 40 pore volumes in the pilot test so far. How, then, do we correlate the fact that we have actually seen a 90 percent reduction in VOCs with the statement that you might need thousands of pore volumes coming out?

MUELLER: I would check one of their chlorinated VOCs in that paper or gasoline compound.

HOSANGADI: And also the site geology. Yes, if you have a lot of clays and silts, absolutely. It might take you -- you might do it for 10,000 pore volume and still not get removal. However, if you have sands and you don't have much clay, which incidentally happens to be the case at JPL, you might need only 100 pore volumes. So, you know, I don't know if necessarily looking at those numbers is the -- you know, is the end of it. You know, we really have to see whether the VOC levels decrease or not. And yes, actually, they did. So, you know, the number of pore volumes really has -- doesn't have that much of an impact on looking at whether the thing is effective or not.

RIPPERDA: You know, we're not trying to argue about this one reference and does it take 100 or

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does it take 10,000. But a concern with a very
 1
    large radius of influence is that it takes a very
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 3
    long time --
        HOSANGADI: Absolutely.
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        RIPPERDA: -- for gas from 400 feet --
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        HOSANGADI: It has to. Yes.
 6
        RIPPERDA: -- to move in. So don't just say,
 7
    oh, we have a 400-foot radius of influence, so we're
 8
    going to use a large well spacing.
        HOSANGADI: And we did not. For the purpose of
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    costing we assumed five wells. The actual number of
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    wells might be two. It might be 20, for all we
12
    know.
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        RIPPERDA: Okay. The point of many of these
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    kind of comments is just --
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        ROBLES:
                 To think about it.
        RIPPERDA: It's not necessarily that we don't
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    believe the 400-foot spacing. It's just that, you
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    know, the time line --
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       HOSANGADI: Absolutely.
        RIPPERDA: -- that's created from the
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    remediation system is moving on with that. So we'll
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23
   move on from that.
        BURIL: That sounds good.
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              Do you have any questions, Vitthal?
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HOSANGADI: That was pretty much it so far.

BURIL: Okay. Heike, if you could help us out and generate that information that we've identified, and we can put the responses together, as Peter has indicated. And we can go from there. I think this will all probably be something that gets dealt with in large part at the point in time the design actually takes place as opposed to anything that needs happening in the immediate future. I don't know if anyone else agrees with that approach.

RIPPERDA: The whole point of this fat amount of comments was just some general questions or concerns that we have when you do the design document.

BURIL: Sure.

RIPPERDA: So you can generate a letter response to this. That would be fine. But mostly --

BURIL: Would it be more appropriate, Mark, that perhaps during the course of the design development itself that we take these things into account and, in fact, address them in the design document such that it's not necessarily an exact response?

RIPPERDA: That was going to be my second option, which was more my point when I wrote this, that this is stuff we're going to be looking for in the design, not that you specifically respond point

by point to this, but that when we read the design 1 document we are asking --2 It addresses these issues so that you 3 don't have to have it readdressed again. 4 RIPPERDA: Right. 5 ROBLES: That's a good point. 6 That way we'll write another response 7 BURIL: and we can just simply incorporate it into the 8 design document. I think that would probably work 9 out a little better. 10 ROBLES: Okay. Why don't we move on, then, to 11 the EPA comments on potential on-site contamination 12 source areas which we have on our agenda. That was 13 the second letter. 14 RIPPERDA: That was more specifically the one 15 related directly to the FS. And I wasn't reading 16 the agenda carefully, and so we already talked about 17 that. 18 ROBLES: Oh, okay. 19 I wanted to talk about that first RIPPERDA: 20 21 before we moved into the SVE stuff. I've screwed up your agenda. I apologize. 22 23

ROBLES: Don't worry. This is only a template. So we have addressed the concerns.

Do we need to do anything more

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specifically on that potential on-site?
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        RIPPERDA:
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                   No.
              But on the SVE design, what's a timetable
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    for getting the initial design document out?
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              Well, I guess we need a ROD first.
 5
              So what's the whole soils schedule?
 6
                 The proposed plan is due about two
 7
        GEBERT:
 8
    months, I think. Right, Richard?
 9
        ZUROMSKI:
                  I believe so, at this point.
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        RIPPERDA:
                  So we're like on track for the
    spreadsheet that you have going?
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        ZUROMSKI:
                   Yeah.
                          Actually, the reason Mark Good
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    from the Navy, who you met last time, who is doing
13
    our contracts work, isn't here today because he's
14
    working on our contracts issues. I think on this
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    Wednesday coming up, the 13th, a contractor is
16
    coming out here. And I think I talked with folks
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    from Foster Wheeler, and Chuck has a question before
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    I continue.
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        BURIL:
                The schedule that you handed out
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21
    earlier, Richard, did that go to the issue of SVE
    design construction?
22
        ZUROMSKI:
23
                   Yes.
                It did. Okay. But, then, as far as a
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        BURIL:
   proposed plan actually coming out, is that still
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within the same time frame as the original schedule
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    identified?
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        ZUROMSKI: I'm not sure.
 3
        GEBERT:
                I have a copy of the --
 4
        ZUROMSKI:
                   Richard has a copy.
 5
        GEBERT: I know the schedule.
 6
        ZUROMSKI: I could get it. It's in my office,
 7
    but --
 8
                Okay. The OU-2 proposed plan is due, I
        GEBERT:
 9
    guess it's to us, it says "Finish, January 12,
10
11
    2001."
                          I think the -- at least the --
        ZUROMSKI:
                  Yeah.
12
    do we have a draft on there too, or just the final
13
    on there?
14
                 The start date is September 11th.
        GEBERT:
15
                   Okay.
        ZUROMSKI:
16
        GEBERT:
                Which is next week. And then I guess
17
    it's due to us --
18
        ZUROMSKI: I'm not sure if that was the draft or
19
    the final, but I'm sure --
20
                 That's probably the final, because the
21
    public comment is going to start Jan 15th. So it
22
   has to be the final.
23
                  We're actually, like I was saying
        ZUROMSKI:
24
    previously, we have a contractor coming out here on
25
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Wednesday to do a site visit of the site, look at the SVE pilot system, gather some data from Foster Wheeler because they're probably going to be doing -- either taking over just the pilot system to continue the pilot test while we're waiting for the actual remedial design and the true remedial action and whether or not they're actually going to do the proposed plan or another one, another contractor is going to do that, we haven't decided. But we're going to be trying to figure that out on Wednesday of this week. And so that looks like -- I mean, we're still shooting for all the dates that are on there. So, sounds good at this point.

GEBERT: Okay. So we can expect a proposed plan in like a month? The first draft, about a month?

RIPPERDA: So we'll be getting our review draft in like late October?

ZUROMSKI: I would say late October, you know.

I think we're going to have our awards done all by
the end of this month. And so they would be working
on that right away. That's the first priority I
think on the OU-2 right now besides continuing, of
course, the work that Foster Wheeler has done. And
the pilot test is another concern as well that
they're working on.

I'll talk about the other contracting issues later on. So we'll just keep going on OU-2 if you guys have any other questions.

RIPPERDA: One more thing on OU-2 that didn't come up at all here, but it's in the comments. And that's I want to piggyback. I want to make -- you know, I want to see if this is reasonable with you guys or not. A perchlorate soil sample. I want to get some soil samples for perchlorate out of the SVE construction.

ZUROMSKI: Yeah.

BURIL: Let me ask a question, though, in that regard just because of the conversation that we were having earlier with regard to having a well placed at a location where there was a known source as opposed to where there was actual VOCs. We may be in a similar situation, but on the other side of the coin, with perchlorate because you may not find perchlorate unless you do put it right where the source was because there is no mechanism save dissolving in water and moving water through the vadose zone that would cause perchlorate to migrate as opposed to VOCs, where you have a mechanism.

RIPPERDA: Right. VOC -- he was talking about actual liquid slugs, possibly, of TCE. You know,

liquid moves under gravity and impeded by various layers. You know, VOCS are going to behave a little differently because their capillary pressure forces and surface tension and stuff like that. But still, liquid moves down.

BURIL: My point being you're too far away from a point where it was induced into the environment.

Unless we have significant layering that would cause that to move laterally across a confining layer, we may not see it unless we're right on top of that.

RIPPERDA: Right. So my point is that perchlorate is going to move more or less like your Vocs. There's going to be some differences, but, you know, first assumption is wherever your liquid Vocs moved is where the water containing the perchlorate also moved. So if you have an area with really high known Vocs in soil, you would guess that that might be the percolation pathway or the introduction and migration pathway. That's one assumption.

The other assumption is, yeah, it moves straight down from the point of introduction. So I would think that --

BURIL: You may have a two-pronged approach.

RIPPERDA: -- that I would want two bore holes,

one that goes to where your soil vapor data shows this is where the most concentrated soil VOCs are, saying, well, that might be one way the liquid went. And another would be go do your most probable source area or a source area and go right near it and straight down.

ROBLES: Your intent, Mark, is to find out where the sources are for the soil?

RIPPERDA: No. My intent is to, for long-term design of the groundwater, to know is there still a load of perchlorate waiting to be introduced into the groundwater. Is the perchlorate all more or less in the groundwater already? Just so we have an idea are you going to be running your perchlorate capture system for 20 years or, you know, 100 years.

BURIL: That makes sense.

RIPPERDA: I know it doesn't rain a lot here and you don't have your storm drains and your cesspools you know, introducing water in the vadose zone in nearly the quantities that it was originally. So there may be perchlorate, a lot of perchlorate in the vadose zone, but maybe it's not really being transported down anymore. But I still just kind of want to know how much perchlorate is sitting underneath JPL.

So anyway, it's not going to be -- I don't 1 want an extensive RI type investigation of 2 perchlorate in soils, but I want to look at two or 3 three locations where you think it's most likely to have perchlorate and just get kind of a vertical 5 profile. 6 When you talk about analyzing for 7 perchlorate in soil, is there a specific approved or 8 recognized method that you would prefer that we use? GEBERT: Yes, there is. 10 Yes. I don't know the number right RIPPERDA: 11 now, but I asked Kevin Mayer, our perchlorate guy at 12 EPA. And he says that there is. 13 I can get you a copy of that. 14 Is it the modified 300 one that they've BURIL: 15 been talking about? 16 RIPPERDA: I don't know the number, but there 17 is. 18 There is. Do you want a copy of it? 19 GEBERT: I think it would be useful just to have 20 the information and method number and what its basic 21 thought is, because I'm sure we can find labs that 22 are more than willing to perform the test. Is there 23 any kind of a certification that you're aware of, 24 Richard --25

```
ZUROMSKI: I'd like to see that.
 1
        BURIL: -- through DTSC's lab program that
 2
    certifies labs for that particular analysis? I know
 3
    that they have it for liquid contained perchlorate.
        GEBERT:
                 I'm sure. Probably is. I'll check on
 5
    that.
 6
                If you could. That way at least we can
 7
        BURIL:
    kind of keep the same QA/QC approach that we've used
 8
    all along.
 9
                 I agree with Mark. You need some data.
10
        GEBERT:
11
    There is a big data gap there as far as perchlorate.
    We don't have any data at all, if there's any
12
    different layers in the soil.
13
                Do you know what the detection limit is
14
        BURIL:
    of that method off the top of your head?
15
        GEBERT:
                 In the soil?
16
        RIPPERDA: I don't know that either, but I know
17
    that it's a perfectly reasonable low detection
18
    limit.
19
        BURIL:
                It's not like 400 or 4,000 or something
20
    like that?
21
        RIPPERDA:
                   Right.
22
        ZUROMSKI: Like 40 or something. 40 or 100.
23
                40 would be okay.
24
        BURIL:
                   I think maybe I saw when I was up in
        ZUROMSKI:
25
                                                   58
```

```
a conference up in San Francisco an EPA
 1
    representative was talking about doing soil sampling
 2
    for perchlorate and they presented a method.
 3
    don't know the answers to the questions that Chuck
 4
    is asking, so --
 5
        RIPPERDA: Nobody is cleaning perchlorate in
 6
    soils currently. You know, the only way -- and
 7
    that's even at places with shallow, like out in the
    Las Vegas Wash where the perchlorates may be down to
    40 feet. So if you do find large quantities of
10
    perchlorate at 150 feet, it's not like we're going
11
    to ask you to wash millions of gallons of water into
12
    the subsurface here to try to flush it out.
13
    more just we want to know.
14
        HOSANGADI: Unless, of course, you put a
15
    reinjection well right there or something.
16
                           That's a good point.
17
        RIPPERDA:
                   Right.
        ROBLES: Okay. Any more on the OU-2 feasibility
18
    study?
19
        RIPPERDA:
                   No.
                        I don't have any more.
20
21
        ROBLES: Anybody else?
              Why don't we go to item 3, Statute AB
22
    2646.
23
                   I just wanted to give a quick status.
24
        ZUROMSKI:
    I don't know if you've been tracking it or not.
25
```

```
I have got the latest e-mail that they -- you can
 1
    set up on your server to automatically send you
 2
    every time they have legislative action on a certain
 3
          And I believe, at least in -- it's passed
 4
    through the committee and it's been amended
 5
    significantly and should be or is, already has been
 6
    voted on in the Assembly, so --
 7
                And the outcome of the vote was?
 8
        ZUROMSKI: It was favorable through the
 9
10
    committee to the Assembly.
11
              And then there was another one which is
    actually pretty cryptic when they send you through
12
             And there was a 40 to zero vote for this
    e-mail.
13
    amended significantly AB 2646, but I'm not sure if
14
    that was the final vote or if that was just another
15
    committee vote or not.
16
17
                Could you do me a favor and send me the
    e-mail address for that?
18
        ZUROMSKI: I would love to.
19
                I've been trying to follow that.
        BURIL:
20
21
                Are the amendments or changes more
    stringent or less?
22
        ZUROMSKI: Less stringent. It's been chopped up
23
    significantly.
24
        HOWELL: They changed the date that they would
25
```

grandfather in any existing systems from January 1st, 2001 to whenever the legislation was passed.

ZUROMSKI: Right.

HOWELL: So it in one way is a significant change in that it's a rather more restrictive requirement in that it would be sua sponte, you got to comply. Or if you want to look at it, if the statute doesn't -- legislation doesn't pass, you got more breathing room because it's not likely to be passed by January 1, 2001 if it didn't make it through August 30th of this year. So that's why this vote that Richard is talking about is important.

BURIL: Do know if the Legislature is going to be meeting again to vote on this between now and the end of the session? No, we don't know or --

ZUROMSKI: I don't know. I don't know. So -BURIL: Let me share with you a conversation I
had with Bob Hayward from Lincoln Avenue, one which
was somewhat revealing in that regard.

According to his contacts in the water purveyor industry, they expect 2646 to go through before the end of this legislative session. And they're preparing for it. That's purveyors in general, according to him.

He has also said that there are moves 1 afoot to reduce the MCLs for some of our target 2 contaminants, most notably TCE, from 5 to .5. 3 So anecdotal information, but important nonetheless. We will continue monitoring this. Ιt 5 still is a rather significant concern of ours. 6 ZUROMSKI: That's all I have on that. 7 ROBLES: Okay. Then we're going to item 4, 8 Groundwater Feasibility Study Update. 9 Impacts of the Southwest Arroyo Toad, our 10 11 endangered species. You're not supposed to be impacting 12 BURIL: those, Peter. I told you to stop throwing them 13 14 against the wall. Since the latest development, we're 1.5 going to have to basically look at that within our 16 impacts on basically OU-1 and -3. The Arroyo, the 17 Arroyo Seco, the whole Arroyo Seco from, I guess --18 what's that canyon up there? Lost Canyon? 19 BURIL: Millard Canyon. 20 ROBLES: MIllard Canyon all the way down through 21 to Devil's Gate Dam is considered one of the 22 critical habitat areas for them. Proposed. 23 Excuse me. Got to get the right 24 Proposed. It's proposed. And it's being looked terminology. 25

at and it will take a while for it to be, but it's basically now that we have to deal with the endangered species on all of our documentation. So that will be one of the items that we'll have to look at.

BURIL: Let me add just a little bit of anecdotal information. Currently we don't see the Southwest Arroyo Toad very often. In fact, it's almost completely absent. However, I did personally see these little critters all over the place in the Arroyo back in about the '92-'93 time frame. In the '93 winter, we had a flood in the Arroyo Seco that went levy to levy, dam to origin, and it was huge and stayed there for a good number of days.

I believe that something happened to the toad subsequent to that little flood to the tune of near extinction in the Arroyo Seco as a result, because we haven't seen these little critters much at all since.

So I don't know that we have an endangered species issue in terms of having them physically here within the program site, but certainly the endangered habitat preservation issue is going to be key.

HOWELL: And that's where, as a federal agency,

```
we have Section 7 responsibilities through an
 1
    executive order also to essentially treat the
    habitat as though it has been listed, even though it
 3
              It's only proposed. Once it's been
    has not.
 4
    proposed, we have to act as though it has been
 5
    listed until the final ruling on that.
 6
                And in so doing we actually treat it as
 7
        BURIL:
    though the creature is physically there.
 8
        HOWELL:
                 Yes.
                It's never about the creature.
        ROBLES:
10
    always about the habitat, because habitat is tied to
11
    the creature. No habitat, no creature. So you
12
    treat the habitat and that's the basic thing,
13
    whether you see the animal or not.
14
                 It will be one of those things we'll be
15
    monitoring in the meantime.
16
                So it could affect your spreading basin
17
        GEBERT:
    option.
18
                 Right.
        ROBLES:
19
        BURIL:
                Absolutely.
20
                 It will have a variety of impacts with
21
        HOWELL:
    regard to our remedial plans, you know, strategies.
22
        CUTLER:
                 The funny thing is if you had spreading
23
    basins, it might help the toad, probably, in
24
    reality.
25
```

HOWELL: We still have not had detailed discussions with the Fish and Wildlife Service. We obviously need to have discussions with them to find out exactly what their plans are if this habitat is being -- and what they're going to be needing from us, if they're going to be needing a biological assessment and biological opinion and in turn what we're going to have to do as far as a site, not just as a Superfund site, but as a federal facility, because we'll need to look at the overall facility. We would obviously try to get the most bang for our buck and try to do everything at the same time.

RIPPERDA: With what Mark said, the various offices of Fish and Wildlife that I have worked with are always keen on anything that creates quality habitat. If it's true that spreading basins are actually beneficial, at other sites that I've worked on Fish and Wildlife would be begging you to incorporate spreading basins into your remedial plan.

HOWELL: That is something that eventually I think this group will need to talk about as far as how we are integrating all the various requirements that we have from the Endangered Species Act. It obviously would be, and rightly so, an ARAR. So we

need to -- this group needs to help us address how we're going to satisfy those requirements.

ROBLES: Getting into the issue of spreading basin or reinjection, let me pull out just the site item. We have started discussion with the City of Pasadena about how to address the OU-3 remediation. Because one of the things that we were looking at is where will we be at sinking a well next to their Arroyo Well and using that as a capture well and then pumping it to someplace for treatment and then deciding on whether do we need to spread it or do we need to reinject it.

And the key is, the main driver for them, for the City of Pasadena, is the Hahamongna project. And one of the things that was suggested is that we sink our well in the Arroyo. That's it right there. Right? Okay. There's a Bainer site that they have asked us to consider. That was a place for treatment that we could pump all the water up there and then treat it and then move it to the other side. And they want the spreading basins to be around here.

There's one problem, though.

BURIL: A little further south than that.

ROBLES: A little further south, like right

here? 1 Right around where it says Ranger 2 Station. Right about here. There's only Okay. ROBLES: 4 That also happens to be where the -one problem. 5 was it the Native American Friends of the Sage? 6 Spirit of the Sage. 7 BURIL: Spirit of the Sage. 8 NOVELLY: Spirit of the Sage folks get their ROBLES: 9 special native plants. 10 NOVELLY: Herbs. 11 Herbs and so on. So to put a spreading ROBLES: 12 basin there might be a conflict. 13 The toad presents another problem to 14 determine whether a spreading basin would be helpful 15 or not, and to determine even if that area is 16 possible for a spreading basin is going to be a big 17 issue. So we've got a major problem in that. 18 The other thing is we don't know if it 19 That's one of the things that we're will work. 20 21 looking at. And the other thing is we're trying to tie 22 this in with the Hahamongna. Because of the 23 endangered species issue, I don't know if their 24 project is going to be able to get off the ground.

major issues.

I think we're going to be way ahead of them.

Whatever we need to do for remediation for OU-3 will be done before they even get this issue resolved.

Because of the endangered species, they're going to have to include that in any plans and that takes a long-time process. They're trying to get the Arroyo Seco delisted from a proposed critical habitat. It takes years. Because they know that if the Arroyo Seco is made a critical habitat, their Hahamongna project is dead in the water. So they've got some

So we're trying to work with them to see how we can do this. And it looks like the spreading basin option is not as attractive and it's going to take a long time for us to get it through their system as opposed to putting our well in, pumping it up to the Bainer site, putting what technology we select, and then pumping it back to our site and then reinjecting it so that we can control the off-migration plume.

RIPPERDA: Along those lines, something I'd like to see as soon as possible, and I don't know if it's possible if you're changing in contracts, is just modeling of how to optimize this. Like you don't need to model to know you need to pump into the

25

Arroyo Well. Right. 2 ROBLES: It's like common sense tells you RIPPERDA: 3 that. 4 ROBLES: Right. Right. 5 And your groundwater model better say RIPPERDA: 6 the same thing or your groundwater model is wrong. 7 But what's not so intuitively self-evident 8 is where it would be best to reintroduce it and 9 would it be good to have an additional well or two 10 somewhere else for capture, you know, either south 11 or west or like whatever. But, you know, we'd like 12 to start getting a technical report together on 13 14 that. Remember you can't reinject. You have CUTLER: 15 to infiltrate. 16 RIPPERDA: I'd say that's debatable. 17 ROBLES: That's the thing. That's why we have 18 our eminent --19 I think you, JPL in general, takes RIPPERDA: 20 kind of a generic rule or resolution or something 21 from the Regional Board and says that's cut and 22 But regional boards in other regions allow 23 certain things that aren't necessarily -- you know, 24

it's like so many of the resolutions are so sweeping

```
that they do make allowances for site-specific, you
1
   know, requirements.
2
                 I'm just saying what we were told.
 3
   don't agree with it.
                   So I'm saying do your technical
 5
   report, decide what's best, and if rejection is
 6
   absolutely best, then you fight for what's best.
                                                       Ιf
 7
   reinjection isn't best, then you don't worry about
 8
        But I want to see a technical report on
 9
    optimization of the groundwater system.
10
                    You mean we fight.
        HOSANGADI:
11
        RIPPERDA:
                   What?
12
        HOSANGADI: You mean we fight.
13
                      We fight with the Regional Board
        ROBLES: No.
14
    or whoever.
15
        RIPPERDA: You know, the BC -- what are we
16
    called?
17
                 The lead agencies.
        HOWELL:
18
                          Anyway, the RPMs.
                                              Ιf
        RIPPERDA:
                   Yeah.
19
    something is the best thing to do, I'm sure that
20
    Alex would take it up his management chain.
21
        ROBLES:
                 Sure.
22
        RIPPERDA: But EPA certainly, you know, is
23
    willing to argue for what makes sense for the best
24
    cleanup. You know, we love the Regional Board.
25
```

work together, all a team. But sometimes EPA has 1 stupid rules and the Regional Board saying "EPA is 2 being stupid." 3 CUTLER: I'm not going to argue. I was going to say, Mark, you're looking 5 6 in the wrong place for an argument. 7 I was being facetious by saying you can't do that. I wasn't -- this is what we were 8 9 told. RIPPERDA: I just don't want a head-in-the-sand 10 11 kind of approach. 12 ROBLES: I think that we should do a technical without the concern about what is --13 RIPPERDA: 14 Right. 15 -- what is optimum for making sure ROBLES: because the whole issue is plume control. That, in 16 my mind, is one major issue in remediation. 17 18 only do we do source reduction, but how do we 19 control the plume. That's a basic concern. 20 that's what we were looking at. So we have had two meetings with the City 21 of Pasadena, and we will continue. The key is that 22 they're looking in the context of the Hahamongna 23 24 project and what the endangered species, in our mind

we don't believe that's going to be viable.

25

By the

time they get their issues resolved with the endangered species, we'll be way ahead.

That's why for us the spreading basin option just became very unattractive once the Arroyo Toad issue became involved. Because for them to resolve it, it may be optimum for them to get it through their system for them to do that and for us to try to advocate it. It seems more likely that the reinjection, we're going to look at it from the technical side and see which is the best way to do that.

So that's what we're looking at and that's what we're pressing and that's why I wanted to get clear to you about these options to let you know where we're at.

Also is the fact that when we were talking with the City of Pasadena, it was clear to us that they had not taken it up their chain of command. We were talking with the worker bees. And there is that issue of trying to get through the City Council on some of the issues. And that is a very arduous process. I've worked with City Council before. And that would delay our response.

So we were looking at what is the best way so that when we are ready to do a remediation in

OU-1 and -3 that would get us quickly so that we can implement this, because it's not enough just to say, okay, we got a Record of Decision, now we take three years to try to get through the City Council. It's not going to help us in that sense. So that was one of the issues that we were looking, and it looks more and more to us favorable for reinjection from that standpoint to keep it all in house to be able to do that.

We will also be talking with the Raymond Basin on Monday. They wanted to be here, but they couldn't. So we will help brief them on what we discussed and we want to work with them on that because they have a major input on this as well for the public.

So that's where we're at on OU-1 and -3.

So we'll be scheduling that. The toad issue is one that's going to have to be involved and incorporated into all documents in the future.

Any questions? Any other comments or suggestions?

RIPPERDA: Before we move off groundwater, kind of the same thing. It always comes up. But if you do have to put wellhead treatment on any well for perchlorate, there's still the whole purveyors'

1 | issue and the DHS requirements.

Is anything being done on putting together the impacted source report and kind of starting the permit process for putting treatment systems on purveyors' wells for perchlorate?

ROBLES: We're looking at that right now. Once we get the contractor on board, we're going to work on those issues. The biggest thing is what we're looking at, once we sink a well next to their Arroyo Well would we ever even consider giving them that well in the future for use. That's where the impact is.

Right now it doesn't look like we can because there are legal issues of then we become a purveyor, and so on. That's one of the things we're trying to wrestle with right now. And we're trying to understand the issues, the legal issues of doing that. And that's one thing that we're getting --

RIPPERDA: My question is not about your new well and giving that water to purveyors. It's what about other wells that are currently owned by Pasadena or other purveyors --

ROBLES: And to support that in their permit.

RIPPERDA: -- that are impacted by perchlorate, JPL's perchlorate and if you have to put or fund a

perchlorate treatment system on their well, the DHS, 1 whatever its number is, requires a permit for new 2 treatment systems. I would expect JPL to be a very 3 active part of getting the permit for that treatment 5 system. BURIL: Let me correct you and say NASA should 6 7 be. 8 RIPPERDA: I'm sorry. 9 ROBLES: NASA. 10 RIPPERDA: NASA should be very active in getting 11 the permit for that system. 12 ROBLES: Or should support them in getting a permit because we wouldn't get a permit. 13 RIPPERDA: You would not get the permit, but 14 15

RIPPERDA: You would not get the permit, but it's your perchlorate. You would be funding the treatment system or working something out with the purveyors. So I've been asking for this every single meeting, but I want to see NASA starting on the permit process in case it becomes required, given how long we know any state or federal permit takes.

16

17

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ROBLES: Okay. Now, right now the only one that would need a permit would be the one that is shut off from the regulations. So the Arroyo Well, if they ever wanted to bring it back on, we need a

permit. 1 CUTLER: Or any well that you want to put the 2 3 system on. 4 BURIL: Any well that was taken off line as a result of contamination, to bring it back on line 5 would have to follow DHS requirements. 6 7 ROBLES: Right. RIPPERDA: 8 There are wells that are currently --I don't know exactly, but I thought there was one or maybe two wells --10 11 ROBLES: There's one other well. 12 RIPPERDA: -- producing over 18 right now. with mixing, they're in compliance. 13 ROBLES: 14 Right. 15 BURIL: Their Well 52 is still in the 50s now, and they must blend it with the remaining two wells, 16 Ventura and Windsor, in order to make it usable for 17 18 public water supply. 19 RIPPERDA: So given that, I would expect at some 20 point that NASA would probably be putting a perchlorate treatment system on a Pasadena drinking 21 22 water well. It's just my expectation. If this whole pilot -- if something works out and you can 23 24 actually treat for perchlorate at, you know,

somewhat reasonable cost, EPA, and I'm sure the

State of California doesn't look favorably on water 1 2 being produced at three times a health-based level 3 and then blended and then sold to the public. 4 So I strongly urge you to start on the 5 highly impacted source review and any other supporting documentation that would go into a 6 7 permit. ROBLES: All right. Any other comments on item 9 4? All right. Let's press on, then, to item 5, Superfund 10 11 Program Transfer Update. Richard. 12 Sure. Well, again, we probably 13 ZUROMSKI: 14 should have switched A and B on our contracts versus transition/descoping plan. Do we want to address 15 the descoping plan at all? 16 17 ROBLES: That is being addressed by Chuck and his group at JPL. We're looking at that the 18 19 administrative record will be transferred to the contractor, Navy contractor by the end of the month? 20 21 By the 18th? BURIL: 18th is the goal. 22 23 ROBLES: 18th is the goal. He's been working on Money has been sent to the Navy. They have 24 25 received it. They are working on -- they're doing

interviews right now and they're getting the
contractors on board. So we're looking at that
right now. We're transitioning as fast as we can on
those items.

Right now they have a laundry list of interviews. They have done some of them. They're going to continue on, and at which time, then, at the next RPM we can give you a list of what has been selected, what has been chosen, what tasks have been delineated and everything else.

ZUROMSKI: I think there's -- in the Federal Facilities Agreement there's a requirement for change of contractor requirement and notification of change of contractor. And I think that probably by or before the next -- probably before the next RPM meeting we will have provided you with that information.

ROBLES: So we'll give you which tasks, which contractors will be responsible and everything else on that so that you have all points of contract on that because that part we have to inform you.

RIPPERDA: Okay.

ROBLES: But they have received their money.

ZUROMSKI: Right.

ROBLES: They're working on it.

```
1
              Any questions? Okay.
              Let's see if we can get Carlos, to go back
 2
 3
    to number 1.
        BURIL: So that means we say good-bye to Heike.
        RIPPERDA: Yeah. Are you still there, Heike?
 5
        MUELLER: Yes, I am.
 6
        RIPPERDA: Well, thank you very much. And
 7
    I'11 --
 8
        ZUROMSKI: Do you want to address other items
 9
10
    first before we go?
11
        RIPPERDA:
                   Before you go, did you have any other
12
    questions or comments?
13
        MUELLER: No, I don't. No, not at this point.
14
        RIPPERDA: Okay. Then we're going to try to get
    Alex Carlos from the Board on.
15
16
        MUELLER: Okay. Sounds good.
        RIPPERDA: And I'll probably talk to you next
17
    week. Are you going to be in the office tomorrow?
18
19
        MUELLER: Yes, I will be. But I will be out
20
    Monday and Tuesday.
        RIPPERDA: I'll try calling you next Wednesday.
21
22
       MUELLER:
                  Okay.
23
       RIPPERDA: Thanks.
24
       MUELLER: Bye-bye.
       RIPPERDA: Bye.
25
```

```
(Discussion held outside the record.)
 1
                   Let's go back to the other items
 2
        ZUROMSKI:
    again. Are there any other items that we want to
 3
 4
    address?
                Quickly. Through oversight or whatever
 5
        BURIL:
    else, we have not formally approved the last two
 6
    Remedial Project Manager meeting minutes. I'm going
 7
 8
    to ask you all to scratch your collective memories
    and please offer up any recollections that you may
10
           If not, I'd like to finalize those as
11
    finished and be ready to deal with them as such.
12
        ZUROMSKI:
                   I'd like to know if you have received
13
    our comments on them and incorporated them.
14
        BURIL: Oh, yes.
15
        ZUROMSKI: So they were received?
16
        NOVELLY: Didn't you get a final copy?
17
        ZUROMSKI: Probably. But I didn't look to see
18
    if the final comments were incorporated, so --
19
        NOVELLY: Always.
                          Yes.
20
        ZUROMSKI:
                   I have no problems, then.
21
        RIPPERDA:
                  I'm impressed that you made comments
22
    on the minutes.
23
        BURIL:
                Hearing no concerns --
24
        GEBERT: I have no concern.
25
                -- we should ask the same question of
        BURIL:
```

1 Alex when he's on the line. But for the last couple meetings we'll go ahead and finalize those and have 2 them made available to be put in the repositories. 3 Do you want to go a little bit on the fluid bed reactor? 5 6 ZUROMSKI: I want to see if there are still any 7 other items. RIPPERDA: Under other items, I've talked with two local attorneys in the last month, and they've 9 10 both come to my office to photocopy documents that 11 they could not find in the local repositories. For example? 12 BURIL: 13 RIPPERDA: The soils RI. BURIL: Which repository was that, and when did 14 15 they look? 16 NOVELLY: They were looking in the Pasadena one. One of them went to Pasadena 17 RIPPERDA: Yeah. and the other one went to all three. So just either 18 19 the libraries are not like giving good directions or 20 somebody has taken them or --Somebody has taken them. 21 ROBLES: We do have a monthly, or we had up until 22 23 this month a monthly monitoring of the repositories. And the RI is one of the documents that should be 24

there. And when we do monitor, if we note that

documents are missing, we do replace them. So
either they got there after a document had been
removed or they were not directed to the right
location.

NOVELLY: We went and reaudited right after

NOVELLY: We went and reaudited right after you called, like about three days after, and they were not -- they couldn't find them either. So we put a new copy in.

RIPPERDA: So it's like you can't control people taking these documents.

NOVELLY: Right.

BURIL: That's right. They grab them and run.

RIPPERDA: Right. Monthly monitoring, you know, seems fine to me. Just so long as you're aware that these are disappearing occasionally and you continue your monthly monitoring.

BURIL: Are you listening, Richard?

ZUROMSKI: I did. I made sure. Because we're getting the contractor on board. I think that's one of the questions that we need to make sure.

NOVELLY: That's why we started the monthly audit because we had been doing it, you know, before then not on a regular monthly basis. And then when we noticed that the documents were starting to pick up on their disappearance, we moved it up to a

regular one. 1 RIPPERDA: The fact sheet that you guys produced 2 months ago now, that actually went out to the 3 public. Right? 4 5 BURIL: Yes. 6 With litigation and things going on, RIPPERDA: 7 who knows who is taking documents. But a lot of 8 sites, you know, have a mailing list of interested 9 public --10 BURIL: We have one that's about 20,000 people 11 long. 12 RIPPERDA: Well, not one that long. Highly interested. People who are interested in actual --13 14 ROBLES: Highly interested. 15 RIPPERDA: -- voluminous documents. A lot of sites you end up sending out, you know, ten or so 16 documents to people who are actually interested in 17 reading them. It might actually be time for another 18 19 fact sheet at the end of these pilot studies. 20 I should be talking to you. 21 We've talked about the fact sheets, 22 whether or not we need to update those. 23 RIPPERDA: So another strong urging, at the end of these pilot studies when you know something about 24 treating for perchlorate, you know, I think it would 25

```
be time for another fact sheet and along with that
  1
    fact sheet would be a request from the public that
  2
    anybody who is interested, contact one of you to
 3
    kind of talk to you in person.
 4
         ZUROMSKI:
 5
                    Sure.
 6
        RIPPERDA:
                    And if they're interested enough,
    they should be added to a mailing list of final
 7
 8
    documents.
                 That might or might not cut down on
    things being stolen from the library.
10
        ZUROMSKI:
                    I just can't see how something can be
    stolen from the library because I've never been able
11
12
    to do that myself.
13
                These documents do not have the --
14
        ZUROMSKI:
                   Oh, they don't have the bar code?
15
                -- electronic bar code or sensor on
        BURIL:
16
    them.
17
                   The library does not want to track
        RIPPERDA:
    these because they're not --
18
19
        ZUROMSKI:
                   So they're not -- then they're not
20
    like regular library information.
21
                In fact, the library in Pasadena has
22
    made it known to us, although not formally, that
    they don't particularly like keeping the repository.
23
24
    It's gotten too big.
        ZUROMSKI: Okay. Well, we may have our
25
```

```
contractor go in and make sure, then, that we're --
  1
    make sure it's all streamlined so that we can track
 2
     it a little bit better. But if that's the case,
 3
     then we'll probably have the same problems.
 4
         BURIL: You will probably see the same thing.
 5
 6
         ZUROMSKI:
                    That's fine.
 7
         ROBLES: Any other items under other items?
 8
              Any other concerns, comments?
 9
        RIPPERDA: Anything happening with litigation
10
    that you can share with us?
11
        HOWELL:
                 Share?
12
        BURIL: All eyes are on Tim.
13
        HOWELL: Just that the Department of Justice is
    still involved. There still is litigation.
14
15
    has been some rulings by the Court that were
    favorably received by the government, but not all
16
    issues have been resolved and there's been some
17
    appeals to the judge's ruling. So, the whole
18
    judicial process grinds on.
19
20
        RIPPERDA:
                  Good job.
21
        ZUROMSKI:
                   It's a good attorney's answer.
22
        BURIL:
                It's moving at a glacial pace. Let's
23
    put it that way.
24
        RIPPERDA: So the attorney -- one reason why --
25
    I don't care how much JPL or NASA have to pay out to
```

```
the public except maybe as a taxpayer. But I do
  1
     care when private attorneys are calling me up and
  2
  3
     coming to my office and bugging me.
  4
         HOWELL: Why are they calling you?
 5
         RIPPERDA:
                    Because they don't trust you guys to
    be giving them the documents, I guess. I don't
 6
 7
    know.
 8
        HOWELL: We're not getting requests for
    discovery. We're not getting requests under the
 9
    Freedom of Information Act.
10
        RIPPERDA: So whatever. Like where are we in
11
    the litigation? Is it now like motions between NASA
12
    and JPL, or is it moving forward towards a jury
13
    trial? What's happening?
14
15
        HOWELL:
                 The latest action from the judge was
16
    that the United States was dismissed from the
    lawsuit. And there have been some appeals to that,
17
    which means that there has been a ruling, but
18
    there's appeals, so you never know what's going to
19
20
    happen.
21
                  So you're speaking very parochially
    as a purely NASA interest person. But in the
22
23
    greater scheme of things, is this moving towards a
24
    jury trial of --
25
        HOWELL: I have no idea.
```

RIPPERDA: Okay. I will stop asking you 1 2 questions. That question, I have no way to answer 3 HOWELL: 4 that question. 5 RIPPERDA: So that concludes my questions. 6 GEBERT: You actually give up. Right? 7 ZUROMSKI: If we could just get Tim to run the 8 whole meeting, we'll be done in ten minutes. ROBLES: I basically believe that by the time we 9 10 have remediation in sight we still won't get an answer because it's going to take a long time. 11 12 I know the frustration that you have with it. But honestly, we have not had requests. 13 14 RIPPERDA: Actually, my frustration is not that 15 But I hate not knowing anything about what's 16 going on when --17 But it is interesting to me that you are being contacted by attorneys when -- I mean, 18 19 obviously, you got your own policy with regard to whether you deal with them or simply refer them back 20 to us. 21 22 But I don't know why they would be approaching EPA when there certainly are avenues to 23 24 get information from us, which ones that have to comply. We have to comply with the same laws that 25

```
you have to comply with. I mean, if there is
 1
    ongoing litigation, obviously, discovery is
 2
    available. And Freedom of Information Act is
 3
    available to anybody any time. And there is
 4
    information that's already publicly available in the
 5
 6
    reading room, and that's easy to get to, also. So I
 7
    mean, if EPA is tired of them banging on your
 8
    door --
        RIPPERDA: No, it's not that. It's like
10
   whatever. I am a public servant. God, I like --
11
    and these have been official FOIAs so I can't just
   blow them off. But it's not so much like, oh, God,
12
   another request for documents. It's just that I'm
13
   dealing with attorneys and the next thing I expect
14
```

16 | HOWELL: Right.

15

17

18

19

20

21

22

23

24

25

RIPPERDA: I just want to know what's going on.

to be dealing with members of the public.

HOWELL: But if there is a burden issue, or if it's something that we need to talk about, we'll talk about it, then. But if it's not a burden yet, then good. But if it does, then let's talk about it.

RIPPERDA: Okay.

HOWELL: Because we don't want to place an undue burden on the EPA for something that can be made

```
available, you know, with everybody knowing that
 1
    it's available there.
 2
        BURIL: Mark, did they identify for whom they
 3
 4
    were working?
        RIPPERDA: Yeah.
 5
 6
        BURIL: And that would be something we won't
    discuss.
 7
 8
                          You know, I actually don't
        RIPPERDA: Yeah.
    know what the rules are on FOIAs and what I can give
    out to other people about FOIAs that have come to
10
11
    me.
12
        BURIL: Was the term "I withdraw the question"?
13
        RIPPERDA:
                   Even if I could, I wouldn't remember
    the -- it's like they both were working for two
14
15
    completely different law firms. They both have lots
    of names in their titles.
16
17
        BURIL: Okay.
        RIPPERDA: I truly don't remember any of their
18
    names.
19
20
        HOWELL: The more names on the letterhead, the
   bigger the firm. The bigger and higher the --
21
22
        BURIL:
                Higher the fees that go along with it.
   Okay. That makes sense.
23
24
        HOWELL: Do you want to try again?
        ZUROMSKI: Try one more time.
25
```

1 RIPPERDA: Yeah.

(Discussion held outside the record.)

ZUROMSKI: I guess I can address the issues on groundwater pilot studies and the two items here, concerns with the sanitary sewer and the Regional

6 Board.

Last Thursday, I think it was, almost a week ago, I know that we raised this issue with the letter that you sent to us with the Regional Board over, what, two months ago or a month and a half ago. And just last Thursday a person from Alex's permitting department, Gary Schultz, called along with Alex on the phone and started and asked several questions regarding our different options for discharge from our pilot system.

And we said that, according to the pilot systems that we've operated here, especially with the Calgon system in the past, we complied with the substantive requirements of the permit that were listed in the EPA letter and we discharge to the storm sewer. And that's what we're planning on doing this time.

So then they said, well, why, number one,
I guess -- I don't know if Alex had talked to him in
the past or not, but he asked why, number one, are

we not looking at discharging to the sanitary sewer.

And also, there was another question regarding some other siting issue. I don't remember what that was.

But anyway, so I called Chuck and then I wrote an e-mail back to them and answered their questions. And they still -- Alex called me this morning and said that they've presented these things up to the Board and -- or to whoever Gary's superior is in the permitting section, and they haven't had any feedback yet. But I think that we all know that -- I think we're continuing forward anyway with discharging to the sanitary sewer based on --

BURIL: No.

ROBLES: Storm sewer.

ZUROMSKI: Excuse me. The storm sewer based on complying with the substantive requirements. And I think one of the reasons we didn't want to go to the sanitary sewer because Chuck had called them back during the Calgon pilot test.

BURIL: The sanitary folks basically say they do not want to accept groundwater discharges under any circumstances.

ZUROMSKI: Right.

RIPPERDA: Because of volume?

BURIL: Volume is one issue and just --

ZUROMSKI: 1 Precedence. BURIL: -- precedence being set for potential 2 3 higher volumes in the future. 4 RIPPERDA: These are your on-site facilities 5 folks? No, no. This is County Sanitation. 6 BURIL: ZUROMSKI: Now, of course, that was two years 7 8 ago and we haven't called them back and the Regional Board didn't ask me to call them back and give them 10 new information. And so I'm assuming that we're 11 still moving forward as we are. Unless I hear 12 otherwise, I'm pretty sure that's how we're proceeding. And we're taking all the required 13 samples and planning on complying with all the 14 substantive requirements. 15 So I was hoping that Alex was basically 16 going to call us or talk to us today about getting 17 18 some final information, get some closure on this. 19 Because actually they sent a Regional Board guy out, one of the new guys in the office, Raul Medina. 20 21 he came out and took a look at the pilot system that you'll see today and took some -- a couple pictures 22 of it, went over to the discharge into the Arroyo 23

We went out into the Arroyo, showed him

from the storm sewer, took a couple pictures of it.

24

that it's basically a dry river bed and this is where the water's going. He took a couple pictures of it.

So I just don't know what they're actually doing right now, if they're trying to figure out.

You know, again, maybe it's a precedent issue with them as well, is this going to set a precedent. I don't know. I really have no idea what they're thinking.

BURIL: I can't imagine it would be a precedent issue because they've had CERCLA sites in this area for years.

ZUROMSKI: Right. So, in any event, we were hoping to get some kind of response from them, whether or not it was for or against what we're doing. I don' know. And we just haven't heard anything yet.

And so -- but at this point, the pilot system that you'll see up there today, the U.S. Filter fluidized bed reactor is there now currently running in what they're calling a recirculation. Basically, they're building up the biomass within the biological filter and it runs for about a week where they're building basically the bugs that will degrade the nitrate and the perchlorate. And so at

1 this point in time we're not really discharging. 2 So we're not really going to have to deal with this until probably next week when we actually start 3 4 pumping and treating the water through the system. I'm hoping we hear something from them by then. 5 But in the meantime we're still moving 6 forward with -- they're actually going to take some 7 8 samples of the extracted groundwater this week to see what our -- basically compare the numbers that 10 we had looked at a while back to what it is right 11 now and see what we're dealing with. And, you know, other than that, they got a whole sampling protocol 12 set out, which I think I had sent you originally in 13 14 that plan that 15 we -- that they had, but it's been revised, not --16 basically based on Mark's comments, so if fits your comments as far as the weekly sampling and for all 17 18 the different constituents, et cetera. So there shouldn't be any major issues, 19 but, again, I don't know --20 21 ROBLES: I think we also have a backup system on there so that --22 23 ZUROMSKI: We do have a backup. Exactly. So explain that a little bit to them. 24 25 ZUROMSKI: And I think that we've designed the

system with enough failsafes that nothing is going to come out of the system, dead or alive. I think that there's -- we have four carbon canisters on the influent to take care of VOCs. We have the fluidized bed reactor, which you'll see, which is for the nitrate and perchlorate, which should destroy that all down to nondetectable levels. Then as another failsafe on top of that, there's an aeration system, and then it goes into an ion exchange system.

So if by some remote possibility some perchlorate gets through this fluidized bed, because we may be adjusting parameters or trying to optimize the system, the ion exchange system is going to knock out all the perchlorate. And then even on the end of that system we have two more carbon beds.

anything to the Arroyo is really very unlikely. And I think that their biggest issue was the two constituents, sulfate and chloride, which I think we talked with them about on the phone about. And that's really what people have been wrestling with right now. And that's also why I'm having the contractor take these confirmation samples this week of the extracted groundwater to see if there's even

still an issue. Because I'm hoping that we were so slightly above their two requirements, which just so happen to be more stringent than drinking water requirements because they're having other issues with us using drinking water to blend because the drinking water has higher mineral constituents than they'll allow us to discharge. So we're dealing with that as well. But I think that's what they're trying to deal with right now.

And so I'm hoping that -- you know, we've told them how much groundwater we're going to treat and discharge, and with all that information we should -- I think that Gary has indicated, at least on an unofficial level, that it shouldn't be a big deal. But if it shouldn't have been a big deal, then I just don't understand why we haven't received a call from them so far.

BURIL: Let me ask a question, Mark. I don't know if you have an answer ready at hand. Given our CERCLA status, does the Regional Board have authority to step in and stop this as a result of having no permit?

RIPPERDA: My answer is no.

HOWELL: And that, of course, is the correct answer.

BURIL: It is the correct answer. 1 I agree. 2 ROBLES: So that answers the permit issue. 3 So, anyway, that's the issue with 4 that right now. 5 You'll see the system up there today. You know, I have some -- I'm going to get -- the 6 7 Regional Board is going to hopefully e-mail me those copies of the photographs that they took of the 8 9 system. I'll e-mail it to everybody. You guys can 10 take a look at all that. And if you have any 11 questions, both the operator who is going to be out 12 here on a daily basis, plus the technical guy who is just basically here for the start-up are both here 13 14 to basically walk you through the system today. 15 you have any questions, don't look at me, look at 16 I can tell you the general flow and how 17 things are working, but if you have anything specific, and he'll probably explain it in pretty 18 significant detail anyway, feel free just to ask 19 20 because they're pretty forthcoming with any 21 information that you need. 22 BURIL: And I have my truck here that I can ferry a good number of us up there. 23 I was thinking we could walk on maybe 24 25 a beautiful day like today, but if you'd like to

```
drive -- it's a fairly short walk.
 1
 2
        BURIL: You have a choice.
 3
        ZUROMSKI: It's up to you. I've been walking up
    there almost daily for the last week or so since it
 4
    was delivered out here. I just get used to it.
 5
 6
              But that's basically it. So any other
    issues specifically on the pilot study itself we'll
 7
    just address them out there.
 9
              So do you guys have anything else on that
10
    item at this point?
11
        GEBERT:
                 No.
12
        ZUROMSKI: Okay. I guess the choice, then, on
    pilot study tour number 7 is -- it's 11:30. We can
13
14
    eat lunch and then go up there or we can go up there
15
    and eat lunch.
        RIPPERDA: This is very similar to the Calgon
16
17
    system?
18
        ZUROMSKI:
                   It's not.
19
               Absolutely totally different.
                   I don't mean that -- that was a
20
        RIPPERDA:
21
    stupid word.
22
                 It's a piece of hunk of equipment out
    there. That's all it is.
23
24
        RIPPERDA: The scope and size of this is very
   similar?
25
```

```
ROBLES: Yes.
 1
                   So it's basically the kind of thing
 2
        RIPPERDA:
 3
    that unless I care to learn how to design this
    myself for my future consulting career, it's the
 4
 5
    kind of thing I can see in --
        ROBLES: Pictures.
 6
 7
        RIPPERDA:
                   -- 15 minutes.
 8
        ZUROMSKI: I'm going to say half hour max.
 9
        RIPPERDA: I would want to go see it now.
10
        ROBLES: So you can get on a plane later.
11
        RIPPERDA:
                   Yes.
12
        ZUROMSKI: Fine.
                          We can do that.
              I guess our next item agenda I guess
13
    should have been number 8, is the next meeting.
14
15
                Yes. If nobody has any other issues or
        ROBLES:
    anything else, let's decide on when we will meet
16
17
    again.
        ZUROMSKI:
                   Every three months?
18
                Three months hence will be December.
19
        BURIL:
20
        ZUROMSKI:
                   So it would be beginning of December,
21
    first week of December?
        GEBERT: Any reason we should meet earlier than
22
    that?
23
24
        ROBLES:
                 I've got a feeling that maybe November
25
   might be better. I see in your eyes, and I feel the
```

```
1
    same way, I think we need to meet sometime in
    November.
 2
 3
        RIPPERDA:
                   I think there's enough going on with
    the pilot study, with the proposed plan coming up
 4
    and the holidays coming later in December that it's
 5
    probably better to go for November.
 6
 7
        ROBLES:
                 Talking about maybe the middle of
 8
    November to give us time?
 9
        ZUROMSKI: Week of the 13th, maybe?
10
        ROBLES: The week of the 13th?
11
        ZUROMSKI:
                   That's the week before Thanksgiving.
12
        BURIL: Be aware they're putting together an ENB
    meeting at headquarters for the last week of
13
14
    November, just so we keep that one aside.
15
        ROBLES: The last week in November. We do the
16
    13th.
17
        RIPPERDA:
                   Either the week before that or that
18
    week; whatever. Like I don't know how the schedule
19
    is going to be looking like by then. But whatever
20
    kind of dovetails the most nicely with --
21
        ZUROMSKI:
                  Which?
                           The week of the 13th?
22
        RIPPERDA: -- reports or anything else that's
23
    happening.
24
        ZUROMSKI:
                   Thursday, the 16th?
25
        GEBERT:
                Is that the second Thursday, 16th?
                                                   100
```

```
ZUROMSKI:
 1
                   That's the third Thursday, actually.
                 That's fine, then. 16th is okay.
 2
        GEBERT:
 3
                 Why don't we shoot for the 16th, then,
 4
    of November.
        ZUROMSKI: Okay. 9:30 here again?
 5
 6
        ROBLES: Yes.
 7
        RIPPERDA: And then a conference call in
    October.
 8
 9
        ROBLES: Yes.
        BURIL: First Thursday of the month.
10
11
        RIPPERDA: So that would be the 5th.
        ZUROMSKI: What time do we do the conference
12
    calls?
            10:00?
13
14
        RIPPERDA: Yes.
15
        GEBERT: October 5th.
16
        ZUROMSKI:
                   Okay.
17
        ROBLES: So we'll have a telecon on the 5th of
    October at 10:00 o'clock and we will have our next
18
19
    RPM meeting on the 16th of November at 9:30, same
20
    time, same station, right here. Okay?
21
        ZUROMSKI:
                   Good.
22
        RIPPERDA:
                  What about the other pilot study
23
    that's starting up?
                        Sure. It's going to basically
24
        ZUROMSKI:
                   Oh.
    start at the end of the U.S. Filter. Actually, I've
25
```

1	received a proposal from them. Actually, these guys
2	are here, Foster Wheeler, and we're evaluating it
3	and negotiating it over the next week or so. So
4	then we're going to get them in there, process
5	going. As soon as U.S. Filter is done, I think
6	they're going to do 60 days, we'll move the other
7	folks in right after that. Basically we've already
8	set up the site for electricity and water discharge
9	and all that stuff so it should be a quick change,
10	in and out.
11	ROBLES: Okay. Any other comments before we
12	close for the tour? Going, going, gone.
13	Okay. The meeting is adjourned. Thank
14	you.
15	(The proceedings adjourned at 11:35 A.M.)
16	
17	
18	
19	
20	
21	
22	
23	,
24	
25	
	102

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17/00 RP	M Meeting	D. NASA-JPZ
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